

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

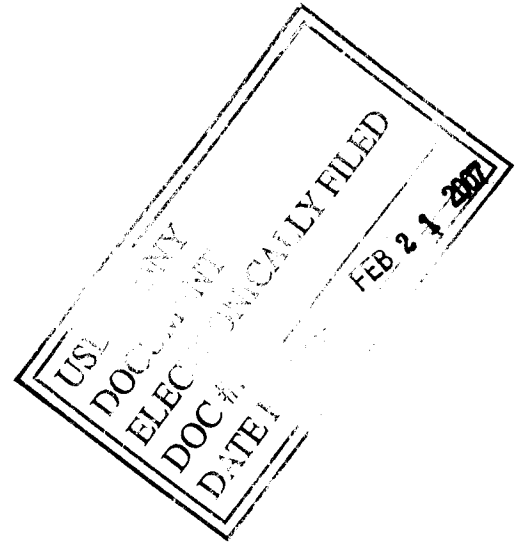
KYO HWA ADLER,
SUN DANEMAN,
CHUN GRANDT,
a/k/a "Texas Imo,"
HYANG RAN KIM,
a/k/a "Tina,"
HYEA KIM,
a/k/a "Patty Kim,"
YONG HUI KIM,
KUM OK LOWERY,
MYONG MOON,
a/k/a "Debbie,"
EUN JA PARK,
MI JA PARK,
SUNG SU PLOURDE,
SENG HEE RYAN,
JAE SHIM,
HYO WON SMITH,
a/k/a "Niko,"
TAE NAM THOMPSON,
CHONG WEISHAUP,

Defendants.

INDICTMENT

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S2 06 Cr. 717 (AKH)



COUNT ONE

The Grand Jury charges:

1. From at least in or about February 2006, up to and including in or about May 2006, in the Southern District of New York and elsewhere, KYO HWA ADLER, SUN DANEMAN, CHUN GRANDT, a/k/a "Texas Imo," HYANG RAN KIM, a/k/a "Tina," HYEK KIM, a/k/a "Patty Kim," YONG HUI KIM, KUM OK LOWERY, MYONG MOON, a/k/a "Debbie," EUN JA PARK, MI JA PARK, SUNG SU PLOURDE, SENG HEE RYAN, JAE SHIM, HYO WON SMITH, a/k/a "Niko," TAE NAM THOMPSON, and CHONG WEISHAUP, the defendants, and others known and

unknown, unlawfully, wilfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, to violate Sections 1589 and 1590 of Title 18, United States Code; Section 2421 of Title 18, United States Code; Section 2422(a) of Title 18, United States Code; and Section 1324(a)(1)(A)(ii) of Title 8, United States Code.

2. It was a part and an object of the conspiracy that KYO HWA ADLER, SUN DANEMAN, CHUN GRANDT, a/k/a "Texas Imo," HYANG RAN KIM, a/k/a "Tina," HYEAE KIM, a/k/a "Patty Kim," YONG HUI KIM, KUM OK LOWERY, MYONG MOON, a/k/a "Debbie," EUN JA PARK, MI JA PARK, SUNG SU PLOURDE, SENG HEE RYAN, JAE SHIM, HYO WON SMITH, a/k/a "Niko," TAE NAM THOMPSON, and CHONG WEISHAUP, the defendants, and others known and unknown, unlawfully, wilfully, and knowingly would and did recruit, harbor, transport, provide, and obtain by any means persons for labor and services in violation of Title 18, United States Code, Section 1589, (a) by threats of harm to, and physical restraint against, those persons; (b) by means of a scheme, plan, and pattern intended to cause the persons to believe that, if the persons did not perform such labor and services, those persons or another person would suffer serious harm and physical restraint; and (c) by means of the abuse and threatened abuse of law and the legal process, in violation of Title 18, United States Code, Sections 1589 and 1590.

3. It was further a part and an object of the conspiracy

that KYO HWA ADLER, SUN DANEMAN, CHUN GRANDT, a/k/a "Texas Imo," HYANG RAN KIM, a/k/a "Tina," HYEAE KIM, a/k/a "Patty Kim," YONG HUI KIM, KUM OK LOWERY, MYONG MOON, a/k/a "Debbie," EUN JA PARK, MI JA PARK, SUNG SU PLOURDE, SENG HEE RYAN, JAE SHIM, HYO WON SMITH, a/k/a "Niko," TAE NAM THOMPSON, and CHONG WEISHAUP, the defendants, and others known and unknown, unlawfully, wilfully, and knowingly would and did transport individuals in interstate and foreign commerce, with intent that such individuals engage in prostitution and in any sexual activity for which a person can be charged with a criminal offense, in violation of Title 18, United States Code, Section 2421.

4. It was further a part and an object of the conspiracy that KYO HWA ADLER, SUN DANEMAN, CHUN GRANDT, a/k/a "Texas Imo," HYANG RAN KIM, a/k/a "Tina," HYEAE KIM, a/k/a "Patty Kim," YONG HUI KIM, KUM OK LOWERY, MYONG MOON, a/k/a "Debbie," EUN JA PARK, MI JA PARK, SUNG SU PLOURDE, SENG HEE RYAN, JAE SHIM, HYO WON SMITH, a/k/a "Niko," TAE NAM THOMPSON, and CHONG WEISHAUP, the defendants, and others known and unknown, unlawfully, wilfully, and knowingly would and did persuade, induce, entice, and coerce individuals to travel in interstate and foreign commerce to engage in prostitution and in any sexual activity for which any person can be charged with a criminal offense, in violation of Title 18, United States Code, Section 2422(a).

5. It was further a part and an object of the conspiracy that KYO HWA ADLER, SUN DANEMAN, CHUN GRANDT, a/k/a "Texas Imo,"

HYANG RAN KIM, a/k/a "Tina," HYEAE KIM, a/k/a "Patty Kim," YONG HUI KIM, KUM OK LOWERY, MYONG MOON, a/k/a "Debbie," EUN JA PARK, MI JA PARK, SUNG SU PLOURDE, SENG HEE RYAN, JAE SHIM, HYO WON SMITH, a/k/a "Niko," TAE NAM THOMPSON, and CHONG WEISHAUP, the defendants, and others known and unknown, unlawfully, wilfully, and knowing and in reckless disregard of the fact that an alien has come to, entered, and remains in the United States in violation of law, would and did transport and move such alien within the United States by means or transportation and otherwise, in furtherance of such violation of law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii).

Overt Acts

6. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about February 27, 2006, KYO HWA ADLER, the defendant, spoke with a co-conspirator not named as a defendant herein ("CC-1") about CC-1 providing women to ADLER's prostitution business.

b. On or about February 13, 2006, SUN DANEMAN, the defendant, spoke with CC-1 about CC-1 providing women to DANEMAN's prostitution business.

c. On or about February 16, 2006, CHUN GRANDT, a/k/a "Texas Imo," the defendant, spoke with CC-1 about CC-1 providing

women and condoms to GRANDT's prostitution business.

d. On or about February 14, 2006, HYANG RAN KIM, a/k/a "Tina," the defendant, spoke with CC-1 about CC-1 providing women and condoms to KIM's prostitution business.

e. On or about February 27, 2006, HYEAE KIM, a/k/a "Patty Kim," the defendant, spoke with CC-1 about CC-1 providing women and condoms to KIM's prostitution business.

f. On or about April 24, 2006, YONG HUI KIM, the defendant, spoke with CC-1 about CC-1 providing women to KIM's prostitution business.

g. On or about February 9, 2006, KUM OK LOWERY, the defendant, spoke with CC-1 about CC-1 providing women to LOWERY's prostitution business.

h. On or about February 22, 2006, MYONG MOON, a/k/a "Debbie," the defendant, spoke with CC-1 about CC-1 providing women to MOON's prostitution business.

i. On or about March 22, 2006, EUN JA PARK, the defendant, spoke with CC-1 about CC-1 providing women to PARK's prostitution business.

j. On or about April 25, 2006, MI JA PARK, the defendant, spoke with CC-1 about CC-1 providing women to PARK's prostitution business.

k. On or about May 15, 2006, SUNG SU PLOURDE, the defendant, spoke with CC-1 about CC-1 providing women to PLOURDE's prostitution business.

l. On or about February 27, 2006, SENG HEE RYAN, the defendant, spoke with a CC-1 about CC-1 providing women to RYAN's prostitution business.

m. On or about April 3, 2006, JAE SHIM, the defendant, spoke with CC-1 about CC-1 providing women to SHIM's prostitution business.

n. On or about April 3, 2006, HYO WON SMITH, a/k/a "Niko," the defendant, spoke with CC-1 about CC-1 providing women to SMITH's prostitution business.

o. On or about April 8, 2006, TAE NAM THOMPSON, the defendant, spoke with CC-1 about CC-1 providing women to THOMPSON's prostitution business.

p. On or about March 1, 2006, CHONG WEISHAUP, the defendant, spoke with CC-1 about CC-1 providing women to WEISHAUP's prostitution business.

q. On or about April 13, 2006, CC-1 drove a woman to a prostitution business in Manhattan.

r. On or about February 18, 2006, CC-1 drove through Manhattan and the Bronx in the course of delivering a woman to a prostitution business located in Washington, DC.

s. On or about February 25, 2006, CC-1 drove through Manhattan and the Bronx in the course of delivering a woman to a prostitution business located in Washington, DC.

(Title 18, United States Code, Section 371)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

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a/k/a "Texas Imo," HYANG RAN KIM, a/k/a
"Tina," HYEK KIM, a/k/a "Patty Kim," YONG
HUI KIM, KUM OK LOWERY, MYONG MOON, a/k/a
"Debbie," EUN JA PARK, MI JA PARK, SUNG
SU PLOURDE, SENG HEE RYAN, MYONG SA, JAE
SHIM, HYO WON SMITH, a/k/a "Niko," TAE
NAM THOMPSON, and CHONG WEISHAUP,

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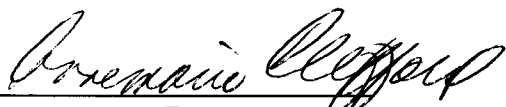
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(Title 18, United States Code, Section
371)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL


Foreperson.

2/21/07 